

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE VOLKSWAGEN TIMING CHAIN  
PRODUCT LIABILITY LITIGATION

Civil Action No. 16-2765 (JLL)(JAD)

**DECLARATION OF  
JAMES E. CECCHI IN SUPPORT  
OF PLAINTIFFS' UNOPPOSED  
MOTION FOR PRELIMINARY  
APPROVAL  
OF CLASS ACTION  
SETTLEMENT**

I, James E. Cecchi, declare as follows:

1. I am an attorney with the law firm of Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. ("Carella Byrne"), counsel of record for Plaintiffs in this action. I make this declaration in support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement, in order to place certain documents before the Court.

2. Attached hereto as Exhibit A is a true and correct copy of the Settlement Agreement with all Exhibits annexed thereto.

3. Attached hereto as Exhibit B is a true and correct copy of the firm resume of Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C.

4. Attached hereto as Exhibit C is a true and correct copy of the firm resume of Kessler Topaz Meltzer & Check, LLP.

5. Attached hereto as Exhibit D is a true and correct copy of the firm resume of Kantrowitz Goldhamer & Graifman, P.C.

Dated: May 14, 2018

s/ James E. Cecchi

James E. Cecchi

**CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.**  
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